

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ZACKARY ELLIS SANDERS,

Defendant.

Case No. 1:20-cr-00143
The Honorable Judge Ellis

Pretrial Conference: Jan. 15, 2021
Trial: Feb. 9, 2021

**DEFENDANT’S SUPPLEMENT TO CONSENT MOTION TO CONTINUE TRIAL,
EXTEND DEADLINE, AND WAIVER OF SPEEDY TRIAL RIGHTS**

Mr. Zackary Ellis Sanders, by and through undersigned counsel, respectfully submits this Supplement to the Consent Motion to Continue, Extend Deadline, and Waiver of Speedy Trial Rights (ECF No. 192), which was filed on January 6, 2021. On the afternoon of January 7, 2021, the defense learned that all video calls between Mr. Sanders and defense counsel will be suspended through January 18, 2021, due to the ongoing COVID-19 outbreak at Alexandria Detention Center (“ADC”). Due in part to the onerous protective order entered in this case, video calls are the only means by which the defense can review documents, discovery, or work product with Mr. Sanders. The last time the defense spoke with Mr. Sanders by video call was December 18, 2020. Mr. Sanders will go at least a month without the opportunity to review documents, discovery, or work product with his defense team. Presumably, Mr. Sanders will also not be permitted to leave ADC to review evidence at the U.S. Attorney’s Office until at least sometime after January 18, 2021. This latest information adds to the reasons why the defense does not have adequate access to Mr. Sanders to allow him to assist in preparing his defense.

Dated: January 7, 2021

Respectfully submitted,

/s/ Jonathan Jeffress

Jonathan Jeffress (#42884)
Emily Voshell (#92997)
Jade Chong-Smith (admitted *pro hac vice*)
KaiserDillon PLLC
1099 Fourteenth St., N.W.; 8th Floor—West
Washington, D.C. 20005
Telephone: (202) 683-6150
Facsimile: (202) 280-1034
Email: jjeffress@kaiserdillon.com
Email: evoshell@kaiserdillon.com
Email: jchong-smith@kaiserdillon.com

Counsel for Defendant Zackary Ellis Sanders

CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of January 2021, the foregoing was served electronically on the counsel of record through the U.S. District Court for the Eastern District of Virginia Electronic Document Filing System (ECF) and the document is available on the ECF system.

/s/ Jonathan Jeffress

Jonathan Jeffress